

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

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|-------------------------|---|-----------------|
| In the matter of: |) | |
| |) | |
| Reach For The Top, Inc. |) | BLL-20171010AAE |
| Venice, CA |) | |
| Facility ID # 196192 |) | |
| |) | |

INFORMAL OBJECTION

In accordance with §73.3587 of the Commission’s Rules, REC Networks (“REC”) is filing this *Informal Objection* against the above application for the reasons herein.¹

In the instant application, Reach For The Top (“RFTT”) has filed a license application to cover a construction permit that expired on October 8, 2017. As October 8 fell on a Sunday and there was a holiday, the next business day is October 10 therefore this application is timely filed. This application specifies operation at 50 watts ERP but it also specifies operation at 50 watts transmitter power output (TPO) utilizing a single-bay Shively 6812 antenna. According to the manufacturer’s specifications for the Shively 6812, a single bay configuration will result in a 3.39 dBu insertion loss at the antenna only. Without even taking any feedline into consideration, 50 watts TPO will result in an ERP of approximately 20 watts (0.02 kW). With feedline loss included, the ERP is further decreased. At 20 watts ERP, this LPFM station produces a service contour of 3.741 km. §73.811(b) of the Commission’s Rules states that LPFM stations may not operate with facilities with 50 watts ERP at 30 meters HAAT or the equivalent necessary to produce a 60 dBu contour that extends at least 4.7 kilometers.

At 50 watts TPO, the above captioned station would not meet §73.811(b) as it does not meet the minimum facilities for LPFM.

¹ - 47 C.F.R. §73.3587 (“Before FCC action on any application for an instrument of authorization, any person may file informal objections to the grant. Such objections may be submitted in letter form (without extra copies) and shall be signed. The limitation on pleadings and time for filing pleadings provided for in § 1.45 of the rules shall not be applicable to any objections duly filed under this section.”)

As the construction permit is expiring for this station and there is no possibility of extension, this is yet another case of a station trying to beat the expiration date. Purely an abuse of Commission process.

REC is requesting that the Commission investigate this Future Roots (Dublab) supported application to confirm that RFTT really constructed a 79 foot antenna at this location in the middle of a residential neighborhood. REC is requesting that this application be dismissed.

Respectfully submitted,

/S/

Michelle Bradley

Founder

REC Networks

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October 10, 2017